

BRYAN SCHRODER
United States Attorney

KYLE REARDON
Assistant U. S. Attorney
Federal Building & U.S. Courthouse
222 W. 7th Avenue, #9, Rm. C-253
Anchorage, AK 99513-7567
Phone: (907) 271-5071
Fax: (907) 271-1500
Email: kyle.reardon@usdoj.gov

Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

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| IN THE MATTER OF THE ARREST OF Julissa Carter | Case No. 3:21-mj-00083-MMS |
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**EX PARTE MOTION TO SEAL
APPLICATION AND AFFIDAVIT IN SUPPORT OF ARREST WARRANT AND
ALL RELATED DOCUMENTS**

FILED UNDER SEAL

COMES NOW the United States of America, by and through the undersigned attorney, and hereby moves for an order sealing the above-numbered Criminal Complaint and Affidavit in Support, and Arrest Warrant, and this motion and order.

This sealing order is requested by the government because of the threat that public filign may pose to law enforcement agents who execute the arrest, as well as to prevent to

potential loss of evidence in this case. Undersigned counsel submits that prematurely disclosing this information could result directly affect the safety of law enforcement officers executing this arrest. The subject of this arrest warrant is Julissa Carter. She is believed to have aided and abetted the escape of Tristan Grant from federal custody. It is possible that when this arrest warrant is executed, Grant may with Carter. Grant is currently charged with numerous violent felonies, including sex trafficking. He is also charged with being a felon in possession and has been previously convicted of that crime. He has been implicated in several shootings in Anchorage in the past several years.

In addition, public filing of this affidavit could result in the loss of evidence and may have a significant and negative impact on the continuing investigation and/or may severely jeopardize its effectiveness. Specifically, this affidavit contains information about the Carter's activities with others that are of interest to law enforcement, including her communications with Grant. If the search warrant is publicly filed, Carter, as well as any other associates who have assisted Grant's escape, may take steps to conceal themselves or tamper with evidence which could seriously jeopardize the investigation.

This Court has the discretion and authority to seal Affidavits in support of search warrants. *See Matter of Sealed Affidavits for Search Warrants*, 600 F.2d 1256 (9th Cir. 1979); *Officers of Lakeside Non-Ferrous Metals v. United States*, 679 F.2d 778 (9th Cir. 1982).

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Motion to Seal
3:21-mj-00083-MMS

Based on the foregoing, the government respectfully requests this Court enter the attached order sealing all papers submitted in support of the above-numbered Criminal Complaint and Affidavit in Support, and Arrest Warrant, and this motion and order r.

RESPECTFULLY SUBMITTED this 17th day of February, 2021, in Anchorage, Alaska.

BRYAN SCHRODER
United States Attorney

/s/ Kyle Reardon
KYLE REARDON
Assistant U.S. Attorney